

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP SECURITIES
LITIGATION

Civil Action No. 12-cv-05724-JGK

**LEAD PLAINTIFF’S NOTICE OF MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT WITH DEFENDANTS**

Court-appointed Lead Plaintiff Mineworkers’ Pension Scheme (“Lead Plaintiff”), on behalf of itself and all other purchasers of American Depositary Shares (“ADS”) of New Oriental Education and Technology Group (“New Oriental” or the “Company”) hereby moves the Court, in Courtroom 12B of the Daniel Patrick Moynihan Courthouse at 500 Pearl Street, New York, New York, at a date and time to be set by the Court, for an order: (a) preliminarily approving the class action settlement, (b) preliminarily certifying a settlement class, (c) approving the manner and form and notice, and (d) setting dates for the Final Fairness Hearing in the above-captioned matter.

This Motion is based upon the accompanying Memorandum of Points and Authorities in Support of Lead Plaintiffs’ Motion for Preliminary Approval of Proposed Class Action Settlement with Defendants and the supporting Declaration of Jeff A. Almeida.

Dated: May 23, 2014

GRANT & EISENHOFER, P.A.

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